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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

PACIFIC COAST FEDERATION OF
FISHERMEN'S ASSOCIATIONS, *et al.*,

Plaintiffs,

v.

WILBUR ROSS, in his official capacity
as Secretary of Commerce, *et al.*,

Defendants.

Case No. 1:20-cv-00431-DAD-SAB

**SUPPLEMENTAL DECLARATION OF
BARBARA CHISHOLM IN SUPPORT
OF PLAINTIFFS' APPLICATION FOR
TEMPORARY RESTRAINING ORDER**

Hearing Date: If not resolved on the papers,
hearing requested by April 6, 2020

Judge: Hon. Dale A. Drozd

Courtroom 5, 7th Floor
2500 Tulare Street
Fresno, CA 93721

1 I, Barbara J. Chisholm, declare as follows:

2 1. I am an attorney representing Plaintiffs Natural Resources Defense Council,
3 Defenders of Wildlife, Golden State Salmon Association, and The Bay Institute in the above-
4 captioned action and am a partner at the law firm of Altshuler Berzon LLP. I am a member in
5 good standing of the bars of the State of California and this Court. I make this supplemental
6 declaration based on my personal knowledge and, if called to testify, could and would testify as
7 stated herein.

8 2. Attached hereto as **Exhibit J** is a true and correct copy of a letter addressed to
9 counsel for the Federal Defendants, which I received today, April 3, 2020, via email at 4:49
10 p.m. from Daniel Fuchs, counsel for the plaintiffs in *California Natural Resources Agency v.*
11 *Ross*, Case No. 1:20-cv-00426-DAD, who wrote on behalf of the Attorney General. In the
12 letter, the Attorney General requests “that Reclamation immediately reduce export of water at
13 the Jones Pumping Plant to at most 900 cfs” and states that “[t]his reduction is necessary to
14 conform Reclamation’s actions to the Declaration of Reclamation’s Central Valley Office’s
15 Operations Manager, Kristin White,” in the above-captioned matter.

16
17 I declare under penalty of perjury under the laws of the United States that the foregoing
18 is true and correct to the best of my knowledge.

19 Executed this 3rd day of April 2020 in Berkeley, California.

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21 /s/ Barbara J. Chisholm
22 Barbara J. Chisholm
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